

1 Nathan R. Ring
2 NV State Bar No. 12078
2 **STRANCH, JENNINGS & GARVEY, PLLC**
3 3100 W. Charleston Boulevard, Suite 208
3 Las Vegas, NV 89102
4 Telephone: (725) 235-9750
4 lasvegas@stranchlaw.com

5 *Attorneys for Plaintiff and the Proposed Class*
5 [Additional Counsel listed on signature page]

6 Todd L. Bice
7 NV State Bar No. 4534
7 **PISANELLI BICE, PLLC**
8 400 S. 7th Street Suite 300
8 Las Vegas, NV 89101
9 Telephone: 702.214.2100
9 tlb@pisanellibice.com

10 Angela C. Agrusa (CA State Bar No 131337)*
11 **DLA PIPER LLP (US)**
11 2000 Avenue of the Stars
12 Suite 400 North Tower
12 Los Angeles, CA 90067-4735
13 Telephone: 310.595.3000
13 angela.agrusa@us.dlapiper.com

14 **Pro hac vice application forthcoming*

15 *Attorneys for Defendant*
16 *MGM Resorts International*

17
18 **UNITED STATES DISTRICT COURT**
19 **DISTRICT OF NEVADA**

20 PAUL ZARI, individually and on behalf of all
21 others similarly situated

Case No. 2:23-cv-01777

22 Plaintiff,

**STIPULATION TO EXTEND TIME
TO FILE DEFENDANT'S
RESPONSE TO COMPLAINT
(SECOND REQUEST)**

23 v.

24 MGM RESORTS INTERNATIONAL,

25 Defendant.

26 Pursuant to LR IA 6-1, Plaintiff Paul Zari and Defendant MGM Resorts International
27 ("MGM") (collectively, the "Parties") respectfully stipulate MGM's time to respond to the
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1 Complaint be extended from the current deadline of December 12, 2023 to and including
 2 January 11, 2024. This is the second stipulation for an extension of time to file MGM's
 3 responsive pleading. The court previously granted an extension on November 14, 2023. ECF
 4 No. 14.

5 Good cause exists to enlarge the time for MGM to respond to the Complaint. There
 6 are currently ten other related actions filed against MGM pending in the District of Nevada
 7 (the "Related Actions"). *See Kirwan v. MGM Resorts Int'l*, No. 2:23-cv-01481 (D. Nev.);
 8 *Zussman v. VICI Properties 1 LLC, et al.*, No. 2:23-cv-01537 (D. Nev.); *Lackey v. MGM*
 9 *Resorts Int'l*, No. 2:23-cv-01549 (D. Nev.); *Pircio v. MGM Resorts Int'l*, No. 2:23-cv-01550
 10 (D. Nev.); *Terezo v. MGM Resorts Int'l*, No. 2:23-cv-01577 (D. Nev.); *Rundell v. MGM*
 11 *Resorts Int'l*, No. 2:23-cv-01698 (D. Nev.); *Bezak v. MGM Resorts Int'l*, No. 2:23-cv-01719
 12 (D. Nev.) *Albrigo v. MGM Resorts Int'l*, No. 2:23-cv-1981 (D. Nev.); *Owens v. MGM*
 13 *Resorts Int'l*, No. 2:23-cv-01480 (D. Nev.); *Manson v. MGM Resorts Int'l*, No. 2:23-cv-
 14 01826. One other action is pending in the District of New Jersey. *Lassoff v. MGM Resorts*
 15 *Int'l*, No. 1:23-cv-20419.

16 The parties in the Related Actions are actively preparing a joint motion to consolidate
 17 the Related Actions. As such, additional time is required to permit time to meet and confer
 18 with the various parties to the Related Actions and finalize the joint motion.

19 The Parties' request is made in good faith to enable the parties to finalize the joint
 20 motion for consolidation and conserve judicial and party resources. Moreover, this case is
 21 in its infancy, and this request will not prejudice any party.

22 **WHEREAS** the Parties respectfully request that MGM shall have until January 11,
 23 2024 to answer, move, or otherwise respond to the Complaint.

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1 Dated: December 11, 2023

Respectfully submitted,

2 /s/Nathan R. Ring
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4 Nathan R. Ring
5 NV State Bar No. 12078
6 **STRANCH, JENNINGS & GARVEY,**
7 **PLLC**
8 3100 W. Charleston Boulevard, Suite 208
9 Las Vegas, NV 89102
10 Telephone: (725) 235-9750
11 lasvegas@stranchlaw.com

12 J. Gerard Stranch IV (Pro Hac Vice)
13 **STRANCH, JENNINGS & GARVEY,**
14 **PLLC**
15 The Freedom Center
16 223 Rosa L. Parks Avenue, Suite 200
17 Nashville, TN 37203
18 Telephone: (615) 254-8801
19 gstranch@stranchlaw.com

20 Lynn A. Toops (Pro Hac Vice)
21 Amina A. Thomas (Pro Hac Vice)
22 **COHEN & MALAD, LLP**
23 One Indiana Square, Suite 1400
24 Indianapolis, IN 46204
25 (317) 636-6481
ltoops@cohenandmalad.com
athomas@cohenandmalad.com

26 *Attorneys for Plaintiff and the Proposed
27 Class*

28 /s/ Todd L. Bice

29 Todd L. Bice
30 NV State Bar No. 4534
31 **PISANELLI BICE, PLLC**
32 400 S. 7th Street Suite 300
33 Las Vegas, NV 89101
34 Telephone: 702.214.2100
35 tlb@pisanellibice.com

36 Angela C. Agrusa
37 **DLA PIPER LLP (US)**
38 2000 Avenue of the Stars
39 Suite 400 North Tower
40 Los Angeles, CA 90067-4735

1 Telephone: 310.595.3000
2 angela.agrusa@us.dlapiper.com
3

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5 *Attorneys for Defendant*
6 *MGM Resorts International*

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8 **IT IS SO ORDERED:**

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1 Hon. Brenda Weksler
2 United States Magistrate Judge

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4 DATED: 12/12/2023